

CULLEN AND DYKMAN, LLP
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Attorneys for Those Interested Underwriters
Lloyds, London who subscribe to Policy No. NA 5505113

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In Re:

Chapter 11
Case No. 14-41260 (CEC)

SURROUNDART MANAGEMENT, LLC

Debtor.

**NOTICE OF APPEARANCE
AND DEMAND FOR NOTICES
AND PAPERS**

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SIRS:

PLEASE TAKE NOTICE THAT Those Interested Underwriters Lloyds, London who subscribe to policy No. NA5505113 (“Underwriters”) hereby appears in the above-captioned case pursuant to Section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and hereby requests, pursuant to Bankruptcy Rules 2002, and 9007 and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the persons listed below at the following address and telephone number:

Matthew G. Roseman, Esq.
Bonnie L. Pollack, Esq.
Cullen and Dykman, LLP
100 Quentin Roosevelt Boulevard
Garden City, New York 11530
Telephone: (516) 357-3700

PLEASE TAKE FURTHER NOTICE, that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, monthly operating report, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by e-mail, facsimile, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of the right of Underwriters: (1) to have final orders in noncore matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Underwriters is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: Garden City, New York
March 20, 2014

CULLEN AND DYKMAN LLP

By: s/ Matthew G. Roseman
Matthew G. Roseman, Esq.
Attorneys for Those Interested Underwriters
Lloyds, London who subscribe to policy
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TO: U.S. Trustee
Office of the United States Trustee
Eastern District of NY (Brooklyn Office)
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, NY 10014

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